

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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	:	
UNITED STATES OF AMERICA,	:	
	:	Case No. 19 Cr. 366 (LGS)
- against -	:	
	:	DECLARATION OF
STEPHEN M. CALK,	:	DANIEL SEMENAK
	:	
<i>Defendant.</i>	:	
	:	
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I, **DANIEL SEMENAK**, pursuant to 28 U.S.C. § 1746, hereby declare under penalty of perjury that the foregoing is true and correct:

1. I am the Executive Vice President and Chief Operating Officer of The Federal Savings Bank of Chicago (“TFSB”), where I have worked since 2014.

2. TFSB’s primary office has been in Chicago, Illinois since 2013. Stephen Calk was the bank’s CEO and Chairman from its inception in 2011 until May 24, 2019, when he stepped down from those roles.

3. The bank’s executive leadership team and most of its employees (including its entire underwriting team) are based in Chicago.

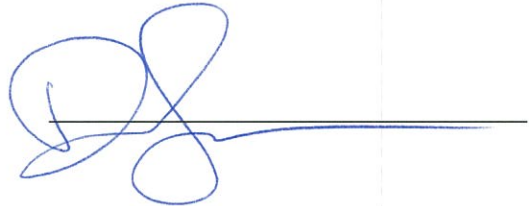
4. It is my understanding that at least thirteen current TFSB employees are potential trial witnesses in this proceeding. Nine of these employees live and work in Chicago; only two live and work in New York. The Chicago-based employees include Javier Ubarri, TFSB’s president (also a member of the loan committee); as well as James Brennan and Thomas Horn, the two primary underwriters on the Manafort loans.

5. Given the involvement of TFSB personnel in this matter, the bank intends to send a representative to observe the trial proceedings on a daily basis. We understand that the trial is estimated to last three to four weeks.

6. In light of the above, it would be far less disruptive to the bank's operations were the trial to be held in Chicago, rather than New York.

7. I understand that the government may call as witnesses Dennis Raico and Anna Ivakhnik, both of whom worked at TFSB's New York offices during the events in question. Neither is currently a TFSB employee.

Executed on: December 20, 2019
Chicago, Illinois

A handwritten signature in blue ink is written over a horizontal line. The signature is stylized, featuring several loops and a long horizontal stroke extending to the right.